

CITATION  
STATE OF LOUISIANA

RISA COCO ETVIR

27<sup>th</sup> JUDICIAL DISTRICT COURT

VS

PARISH OF ST. LANDRY

DG LOUISIANA ETAL

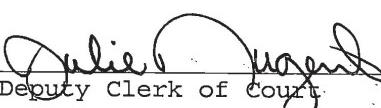
CIVIL NO. 21-C-2212-C

TO THE DEFENDANT DG LOUISIANA, LLC, THROUGH CORPORATION SERVICE  
COMPANY, 501 LOUISIANA AVENUE, BATON ROUGE, LA 70802

You are hereby summoned to comply with the demand contained in the petition/of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance,either by filing a pleading or otherwise, in the 27th Judicial District Court in and for the Parish of St. Landry, State of Louisiana, within fifteen (15) days after the service hereof,under penalty of default.

Witness the Honorable the Judges of said Court, this 31ST day of AUGUST, A. D. 2021.

Issued and delivered September 1, 2021

  
Deputy Clerk of Court

REQUESTED BY: KARNINA D. KING (P1)

EXHIBIT A

CITATION  
STATE OF LOUISIANA

RISA COCO ETVIR

27<sup>th</sup> JUDICIAL DISTRICT COURT

VS

PARISH OF ST. LANDRY

DG LOUISIANA ETAL

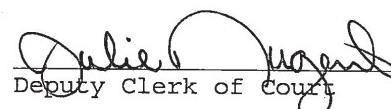
CIVIL NO. 21-C-2212-C

TO THE DEFENDANT DG LOUISIANA, LLC, THROUGH CORPORATION SERVICE COMPANY, 501 LOUISIANA AVENUE, BATON ROUGE, LA 70802

You are hereby summoned to comply with the demand contained in the petition/of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance,either by filing a pleading or otherwise, in the 27th Judicial District Court in and for the Parish of St. Landry, State of Louisiana, within fifteen (15) days after the service hereof,under penalty of default.

Witness the Honorable the Judges of said Court, this 31ST day of AUGUST, A. D. 2021.

Issued and delivered September 1, 2021

  
Deputy Clerk of Court

REQUESTED BY: KARNINA D. KING (P1)

RISA COCO AND JONTY COCO

27<sup>TH</sup> JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. 21-C-2212-C

DG LOUISIANA, LLC, AND  
ABC INSURANCE COMPANY

ST. LANDRY PARISH, LOUISIANA

**PETITION FOR DAMAGES**

NOW INTO COURT, through undersigned counsel comes RISA COCO and JONTY COCO, a person of the full age of majority and a resident of St. Landry Parish, State of Louisiana, who for their Petition for Damages does aver and say that:

1.

Made DEFENDANTS herein are:

- A. DG LOUISIANA, LLC, a foreign limited liability company licensed to do and doing business in the State of Louisiana; and
- B. ABC INSURANCE COMPANY, upon information and belief, a foreign owned insurance company licensed to do and doing business in the State of Louisiana, which is made a defendant herein pursuant to Louisiana's Direct Action Statute.

2.

Plaintiff, RISA COCO, on June 19, 2020, was a customer at DG LOUISIANA, LLC, located at 169 Oak Tree Park Drive, Sunset, Louisiana. As she was walking down the aisle, she slipped and fell in a puddle of a liquid substance.

3.

Upon information and belief, at the time of the subject accident, the facility was understaffed and the employees failed to maintain proper inspection procedures.

4.

Plaintiff's fall was caused by the floor being maintained in an unsafe condition in that there was a liquid substance on the floor. Defendant failed to warn of the dangerous condition of which they should have known of had they reasonably inspected the premises. Further, Defendant knew or should have known that liquid substances was near and, in the aisle, and failed to mitigate the risk of harm to customers such as Plaintiff.

5.

The acts of fault, gross and wanton negligence, and under theory of strict liability, by DG LOUISIANA, LLC, are the proximate cause of injury, and damages sustained by plaintiff.

St. Landry Parish Clerk of Court's Office

Filed 6/16/2021

*Louis George*

Dy. Clerk

LM 15 21 39205  
31 LANDRY PARISH

OPELOUSAS, LOUISIANA 9-1, 2021  
This is to certify that the above is a true  
and correct copy of the original on file in the  
office of the Clerk of Court of St. Landry Parish.

*Julie L. George*  
Deputy Clerk of Court

6.

With all times relevant, Defendants, upon information and belief, **ABC INSURANCE COMPANY** insured Defendant **DG LOUISIANA, LLC** and are responsible for the damages caused to Plaintiff as a result of the above-mentioned negligent conduct of Defendant, **DG LOUISIANA, LLC.**

7.

Plaintiff, **RISA COCO**, suffered past, present and future pain and suffering, medical expenses, permanent disability, loss of income, loss of enjoyment of life, and other losses to be determined at trial.

8.

Plaintiff's husband, **JONTY COCO** has suffered mental anguish and loss of consortium due to Plaintiff's injuries.

**WHEREFORE** Plaintiffs pray that the Defendants be served with citation herein and after due hearings, there be judgment in their favor and against the Defendants for all just and equitable relief to include damages for personal injury, lost wages, past, present, and future medical expenses, pain and suffering, loss of consortium, and costs.

RESPECTFULLY SUBMITTED:

PLEASE WITHHOLD SERVICE.

JOHN W. MILTON, Bar Roll # 19066  
KARNINA D. KING, Bar Roll #35463  
RYAN ELTON KING, Bar Roll #39489  
King Milton Law Group, L.L.C.  
213 East Willow Street (70501)  
P. O. Box 91362  
Lafayette, Louisiana 70509  
Tel: (337) 548-3030; Fax: (888) 489-5089  
E-Mail: [jmilton@kingmiltonlaw.com](mailto:jmilton@kingmiltonlaw.com)  
[kking@kingmiltonlaw.com](mailto:kking@kingmiltonlaw.com)

St. Landry Parish Clerk of Court's Office

Filed 6-16-21

Dy. Clerk

OPELOUSAS, LOUISIANA 9.1 2021  
This is to certify that the above is a true  
and correct copy of the original on file in the  
office of the Clerk of Court of St. Landry Parish.

Deputy Clerk of Court

RISA COCO AND JONTY COCO

VERSUS

DG LOUISIANA, LLC, AND  
ABC INSURANCE COMPANY

27<sup>TH</sup> JUDICIAL DISTRICT COURT

DOCKET NO. 21C2212C

ST. LANDRY PARISH, LOUISIANA

\*\*\*\*\*

STATE OF LOUISIANA

PARISH OF LAFAYETTE

VERIFICATION

BEFORE ME, the undersigned authority, duly commissioned, qualified, and sworn in  
and for the State and Parish aforesaid,

PERSONALLY CAME AND APPEARED:

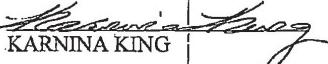
RISA COCO and JONTY COCO

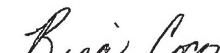
who after first being duly sworn, did depose and state that all of the allegations on the foregoing  
Petition are true and correct to the best of their knowledge and belief.

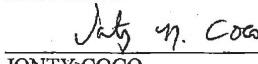
Done and passed at Lafayette, Louisiana, this 16<sup>th</sup> day of June, 2021, in  
the presence of competent witnesses, who sign with appearer and me, officer, after due reading  
of the whole.

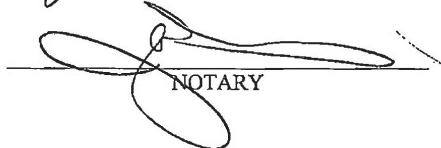
WITNESSES:

  
STAR THOMAS

  
KARNINA KING

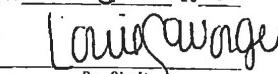
  
RISA COCO

  
JONTY-COCO

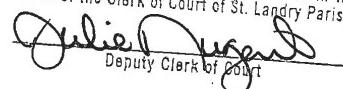
  
NOTARY

St. Landry Parish Clerk of Court's Office

Filed 6-16-21

  
Louis Swango  
Dy. Clerk

OPELOUSAS, LOUISIANA 9-1-2021  
This is to certify that the above is a true  
and correct copy of the original on file in the  
office of the Clerk of Court of St. Landry Parish.

  
Julie Dugard  
Deputy Clerk of Court